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August 19, 2021

Via e-file:

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**Re: GILMAR GOMES DE OLIVEIRA vs. UNITED STATES OF AMERICA
D/Accident: 02/15/2020**

Dear Sir/Madam:

Enclosed please find original Complaint & Jury Demand in the above-captioned matter.

Very truly yours,

JOHN J. PISANO, ESQ.

JOHN J. PISANO, ESQ.
Attorney ID: 001021987
123 North Union Avenue
P.O. Box 705
Cranford, New Jersey 07016
(908) 272-3800
Attorney for Plaintiff(s)

GILMAR GOMES DE OLIVEIRA
Plaintiff,

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

vs.

Docket #: 2:21-cv-15680

UNITED STATES OF AMERICA
Defendants.

COMPLAINT & JURY DEMAND

Plaintiff, Gilmar Gomes De Oliveira, residing at 750 Vine Street, Elizabeth, NJ 07202, by way of complaint against defendant, United States of America care of United States Attorney Craig Carpentio, 970 Broad Street, Suite 700, Newark, NJ 07102 and United States Attorney General William P. Barr, 950 Pennsylvania Avenue NW, Washington, DC 20530 says:

FIRST COUNT


1. On 02/15/20 plaintiff, Gilmar Gomes De Oliveira was the operator of a motor vehicle westbound on East 3rd Ave, at the intersection of Park Street, in Roselle, New Jersey.
2. On 02/15/20 defendant, an employee of the defendant, United States of America, proceeded southbound on Park Street, at the intersection of East 3rd Ave, in Roselle, New Jersey.
3. On 02/15/20 defendant, an employee of the defendant, United States of America was negligent in the operation of defendant, United States of America's motor vehicle, in that she disregarded a stop sign and struck the driver's side of plaintiff's vehicle, thereby causing a collision.
4. In accord with 28 U.S. Code § 2401 requiring notice of a claim within 90 days, Notice of this claim was provided to United States Postal Service on 02/11/21 by certified mail. In accord with 28 U.S. Code § 2401, six months has lapsed between the date of the accident and the filing of the within law suit.
5. As a direct and proximate result of the negligence, carelessness and recklessness of the operator

of, defendant, United States of America's motor vehicle, in the operation of defendant, United States of America's motor vehicle, plaintiff, Gilmar Gomes De Oliveira, sustained severe bodily injury and mental anguish.

6. As a direct and proximate result of the said collision and negligence, carelessness and recklessness of the operator of defendant, United States of America's motor vehicle, plaintiff, Gilmar Gomes De Oliveira, was caused to expend diverse sums of money for medical bills and treatment, was incapacitated and unable to perform his normal occupation, daily duties and social endeavors and in the future will be so damaged.

WHEREFORE, plaintiff, Gilmar Gomes De Oliveira, demands judgment against the defendant, United States of America, individually, jointly and severally, or in the alternative, for damages, interest, cost of suit, attorney's fees and relief the Court may deem equitable and just.

DATED: August 19, 2021

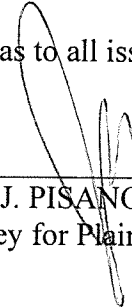


JOHN J. RISANO, ESQ.
Attorney for Plaintiff(s)

JURY DEMAND

The plaintiff hereby demands a trial by jury as to all issues herein.

DATED: August 19, 2021



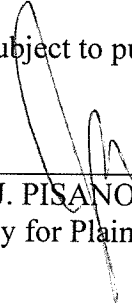
JOHN J. PISANO, ESQ.
Attorney for Plaintiff(s)

CERTIFICATION OF VERIFICATION

I represent the plaintiff in the foregoing Complaint. The allegations in the Complaint are true to the best of my knowledge, information and belief.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: August 19, 2021



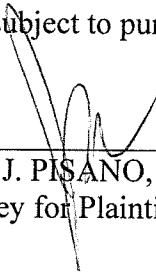
JOHN J. PISANO, ESQ.
Attorney for Plaintiff(s)

CERTIFICATION OF COUNSEL

Pursuant to Rule 4:5-1 the undersigned hereby certifies that at the time of the filing this Complaint, the matter in controversy is not the subject of any other action pending in any Court and/or Arbitration proceeding between these parties.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: August 19, 2021



JOHN J. PISANO, ESQ.
Attorney for Plaintiff(s)